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TO: Income Maintenance Supervisors
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Income Maintenance Staff

W-2 Agencies

Workforce Development Boards Job Center Leads and Managers

Training Staff

Child Care Coordinators

FROM: Shawn Smith, Bureau Director

Bureau of Enrollment Policy & Systems

Division of Health Care Access and Accountability

| DHS OPERATIONS MEMO | | | |
|-----------------------|--------------------------|----|--|
| No: DHS 14-16 Amended | | | |
| DATE: 4/18/2014 | | | |
| FS SC BC+ Basic | MA CTS C BC+ | | |
| CC CF RAP | W-2 JAL WIA | EA | |

SUBJECT: UTILITY ALLOWANCE/WHEAP FOODSHARE CHANGES

CROSS REFERENCE: FSHB 4.6.7.3 Standard Utility Allowances

FSHB 8.1.3 Deductions

EFFECTIVE DATE: APRIL 28, 2014

PURPOSE:

This memo announces a change to the FoodShare (FS) policy that allows issuance of the Heating Standard Utility Allowance (HSUA) to all FoodShare applicants and members based on the reasonable anticipation of receipt of an energy assistance payment through the Wisconsin Home Energy Assistance Program (WHEAP).

BACKGROUND:

Wisconsin implemented a process in 2009 where the Department of Administration (DOA) started issuing an annual energy assistance payment of \$1 to FS households who did not already receive WHEAP. This allowed Wisconsin to grant all FS households the HSUA regardless of the utility obligation(s) incurred. Since that time, we have not collected utility obligation information for FS determination purposes.

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The 2014 Farm Bill requires that a household must have received a WHEAP payment of greater than \$20 in the past 12 months in order to receive the HSUA based on receipt of WHEAP. The annual process of DOA issuing a \$1 benefit to a FS household's Quest card in lieu of a WHEAP payment will be discontinued. Households who do not receive WHEAP will be granted the appropriate utility allowance based on utility obligations. This change is to be applied for all FS applications with a filing date on or after April 28, 2014 and FS renewals processed on or after April 28, 2014 for a recertification period starting June 1, 2014.

Households who have a heating obligation or receive a WHEAP payment of greater than \$20 will still be granted the HSUA and will not be impacted by this change.

POLICY:

FoodShare households that have received a WHEAP payment in the current month or within the past 12 months will receive the HSUA. The WHEAP payment does not have to be received at the household's current residence in order to receive the HSUA. Households that have not received WHEAP will receive the appropriate utility standard based on the utility obligation(s) incurred by the household at the food unit's current residence as described below:

- 1. The Heating Standard Utility Allowance (HSUA), if obligated to pay, or actually paying for <u>any</u> heating source, including but not limited to gas, electric, wood, propane, etc.
- 2. The Limited Utility Allowance (LUA), if obligated to pay, or actually paying for two or more of any non-heat qualifying utility expenses. The qualifying utility expenses are phone, water, sewer, electric, cooking fuel, or trash.
- 3. The Electric Utility Allowance (EUA), if obligated to pay, or actually paying for only a non-heat electric bill.
- 4. The Cooking Fuel Utility Allowance (FUA), if obligated to pay, or actually paying for only a fuel used for cooking that is not also used for a heating source.
- 5. The Water Utility Allowance (WUA), if obligated to pay, or actually paying for only a water bill, a sewer bill, septic tank installation or maintenance, or wastewater treatment bill.
- 6. The Phone Utility Allowance (PUA), if obligated to pay, or actually paying for only a telephone, including cellular phones.
- 7. The Trash Utility Allowance (TUA), if obligated to pay, or actually paying for only a trash or garbage bill.

CURRENT UTILITY STANDARD ALLOWANCE AMOUNTS:

| HSUA (Heating Standard Utility Allowance) | \$450 |
|---|-------|
| LUA (Limited Utility Allowance) | \$313 |
| EUA (Electric Utility Allowance) | \$153 |
| WUA (Water and Sewer) | \$80 |
| FUA (Cooking fuel) | \$32 |
| PUA (Phone Utility Allowance) | \$30 |
| TUA (Garbage and Trash) | \$18 |

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If a household does not claim to have any utility obligation for the current residence and has not received a WHEAP payment, no utility allowance will be granted.

When utility bills are not in a food unit member's name, but the food unit claims responsibility for the bill and the address for the utility bill is the same as the food unit's address, allow the appropriate utility standard. If separate food units share utility expenses and a residence, each food unit should be granted the full utility standard, regardless of which food unit receives the bill.

Self-employed households who claim 100% of utility expenses as a business deduction on their tax forms are not entitled to a utility allowance. If less than 100% is claimed as a business deduction, the household is entitled to the appropriate utility allowance.

VERIFICATION:

If a household claims to have received WHEAP within the current month or past 12 months, verification will be required; workers will have access to this verification via the data exchange, DXLI, in the CARES Mainframe.

Note: As part of the FS interview, during the heating season (October through May), workers should refer households with a heat or electric obligation to apply for WHEAP if the household has not already received a WHEAP payment for that heating season. More information can be found at: http://www.homeenergyplus.wi.gov/

For households that have not received a WHEAP payment, verification of the household's utility obligation(s) will be required only if determined questionable. If verification is requested and not submitted, the utility expense would not be considered when determining which utility allowance is appropriate for the household.

Example 1: A household owns their home. If the applicant or member claims responsibility for all household utilities, including heat, verification should not be required as this is not questionable.

Example 2: A household claims to be responsible for paying heat in their apartment. The lease indicates heat is included in the rent. Because there is conflicting information, the utility expense claimed would be considered questionable.

SYSTEM & CORRESPONDENCE UPDATES:

System changes will be made in two phases to accommodate this policy change. The first set of changes will be made to ACCESS, CWW and related FS correspondence over the weekend of April 26, 2014. These changes are described below. Changes that are planned for the second phase are tentatively scheduled for late June 2014 and are noted as such.

ACCESS:

ACCESS Apply for Benefits (AFB) will be updated to display utility bills questions for FS applications. Applicants will have the opportunity to indicate the utility bills household members are responsible for, the amount of the utility obligation and if the utility is used for heating. Applicants will continue to be asked if their household received WHEAP.

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AFB will also be updated so the \$450 HSUA utility value is no longer pre-populated and used for all priority service screenings. Applicants will be instructed to enter the appropriate utility allowance value based on the utilities the household is obligated to pay. An error message will display if the amount the applicant enters exceeds the \$450 HSUA. An enhancement is scheduled for late June 2014 to allow applicants to select from a list of utility obligations so ACCESS can correctly determine the appropriate utility standard to use in the priority service screening.

ACCESS Renew My Benefits (RMB) will be updated to display utility bill questions for FS renewals to allow members the opportunity to report new utility obligations or if an old obligation has ended.

ACCESS Am I Eligible? (AIE) will be updated so that the \$450 HSUA utility value is used only when an individual indicates a heating utility obligation.

The ACCESS Six Month Report Form (SMRF) for FoodShare will be updated so members are asked about utility obligations when the household reports a change in address. If an address change is reported but the utility questions are not answered, the SMRF is not to be considered incomplete.

CARES:

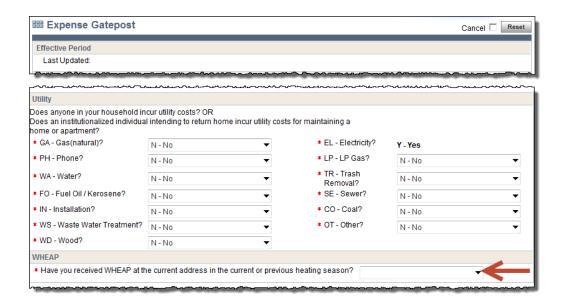
PRIORITY SERVICE DETERMINATION PAGE

The Priority Service Determination page in CWW will be updated so the \$450 HSUA utility value is no longer pre-populated and used for all priority service screenings. If a FS application is submitted using ACCESS, the applicable utility standard entered in the ACCESS priority screening will be brought over to the Priority Service Determination page in CWW. For FS requests submitted through other routes, workers should enter the applicable utility allowance for the household in the 'Monthly Utilities' field on the page based on claimed utility obligation(s) when screening over the phone or the FS Page 1 (Form 16019A or 16019B).

EXPENSE GATEPOST PAGE

The Expense Gatepost page will be updated so that the question in the WHEAP section of the page: 'Have you received WHEAP at the current address in the current or previous heating season?' is no longer automatically set to 'Yes' and locked for editing. As of April 28, 2014, the field will be blank for all new FS intakes and the value will be cleared at FS renewal. For ongoing cases, it will be updateable.

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The WHEAP question on the Expense Gatepost page will be updated in late June 2014 to ask: 'Has your household received WHEAP in the current month or past 12 months?'

As part of each FS intake, renewal, or address change, workers should use the data exchange, DXLI, to determine if any individual in the household has received WHEAP within the current or past 12 months. To access the data exchange, workers must navigate to the CARES Mainframe and enter DXLI in the 'NEXT TRAN' field and the individual's Social Security Number in the 'PARMS' field.

Screen DXLI displays the current demographic data that is entered in CARES Worker Web (CWW), as well as the current demographic data contained in the WHEAP payment system, including the latest payment date. Although the dollar amount of WHEAP payment is not displayed on DXLI, workers can be assured that the individual received a payment of more than \$20 as the minimum benefit check issued to WHEAP eligible individuals is \$30.

```
DXLI
                       LIHEAP QUERY SCREEN
                                                              03/26/14
                                                                        14:08
                                                        UPDATED DATE:
                                                                        01 24 2014
CARES INFORMATION:
      SSN:
                          CASE:
                               APPLE
     NAME: CLIENT
                                                    SEX: F
                                                             DOB:
               NUMBER UNIT DIR ST/RURAL RT/BOX#
                                                        SUF OUAD APT
      ADDRESS: 1234
                                   APPLICATION
                                                        RD
         CITY: ANYWHERE
                               STATE: WI ZIP: 12345
LIHEAP INFORMATION:
      SSN:
     NAME: CLIENT
                              APPLE
                                                     DOB:
     ADDRESS LINE 1: 1234 APPLICATION RD
     ADDRESS LINE 2:
                CITY: ANYWHERE
                                      STATE: WI ZIP: 12345
       PAYMENT DATE: 01 23 2014
PF17 - AFTQ
                    PARMS:
                                                                            MORE..
NEXT TRAN: DXLI
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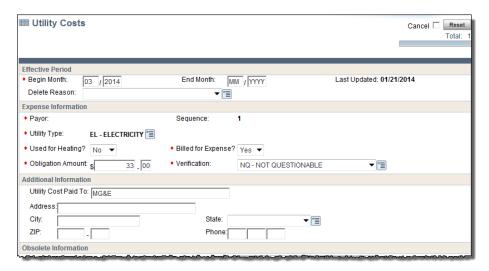
If any household member has received a WHEAP payment in the current or prior heating season (within the past 12 months), workers should enter a "Y" in CWW for the Expense Gatepost page question 'Has your household received WHEAP in the current month or past 12 months?'. This will be used in CWW to allow the recipient the Heating Standard Utility

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Allowance (HSUA) in their FoodShare eligibility determination, regardless of other utility cost information entered on the case.

Note: A DXLI query should be performed for all household members, including minors, as there are a limited number of circumstances in which a WHEAP benefit may be issued to a minor.

There are no changes to the Utility Cost page. As verification of utility obligation is to be requested only when questionable for FS, workers should leave the default verification value of 'NQ – Not Questionable' on the page unless conflicting information about the household's utility obligation claim has been received.



If a utility page includes a response of 'Yes' in the 'Used for Heating' field, the HSUA will be granted in the FS budget. If the response to this question is 'No' for all utilities, the combination of utility types on the Utility Cost page(s) will be used to determine the appropriate utility standard in the FS budget. The 'Billed for Expense?' field does not impact the FS utility standard. Workers should only enter utility expense(s) the household has the obligation to pay.

Note: Although the amount of the utility obligation is not important to determine the standard utility allowance for FS, it may be needed for other purposes such as Elderly Blind or Disabled Medicaid (EBD MA) or determining if a case meets an error prone profile. As a best practice, workers should enter the amount claimed by the food unit for each utility in the Obligation Amount field. Utility costs entered with \$0 in this field will not be used in the calculation of the FS utility standard.

Note: As Utility Cost page information has not been used for FS for several years, workers should evaluate existing sequences on this page at the time of application or renewal in order to close out or update old, outdated information.

ELIGIBILITY/BENEFIT DETERMINATION CHANGES:

When eligibility is run for FS on or after April 28, 2014, CARES will apply the new policy to determine the correct utility standard, using the response to the WHEAP question on the Expense Gatepost and the entries on the Utility Cost page(s).

Applications

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The new policy should be applied to applications filed on or after April 28, 2014. Applications in progress with a filing date prior to April 28, 2014 that have not yet been confirmed are not subject to this new policy until the next regularly scheduled FS renewal.

Ongoing Cases

For ongoing cases, the policy is effective at renewal starting with renewals due May 31, 2014 where the renewal process is started on or after April 28th. Any FS renewals with interviews completed prior to 4/28 that are still in progress as of 4/28 are not subject to this policy change until their next renewal. The WHEAP question on the Expense Gatepost page will not be worker enterable prior to April 28, 2014. Workers will not be required to update the WHEAP question on the Expense Gatepost Page or the Utility Cost pages on these cases even if the renewal has not been confirmed by April 28th.

Example 1: A household submits a May FS Renewal using ACCESS on April 29, 2014. During the interview on May 1st, the worker queries DXLI and finds that WHEAP has not been received for the household. As part of the interview, the household states that they are responsible for paying heat and electric. The worker updates the case accordingly and runs and confirms FS on May 1, 2014. Based on the new utility policy, the household will be allowed the HSUA based on the utility obligations starting with June benefits.

Example 2: A household completes the May renewal on April 20th and submits all requested verification on April 25th. The worker runs eligibility and confirms the June benefits. The household is allowed the HSUA based on the "Yes" entered on the WHEAP question on the Expense Gatepost question. The household will be allowed this deduction until the next renewal.

If a household has not received a WHEAP payment and reports an address change outside of the application or renewal interview without providing utility obligation information, the worker should attempt to contact the member to collect this information.

Verification

Functionality to pend FS benefits and generate a verification checklist (VCL) from the Expense Gatepost page and the Utility Costs page will be added to CWW in late June 2014.

Until those changes can be made, CARES will not pend FS for verification of utility expenses. Workers should use the default verification code value of 'NQ' on the Utility Costs page whenever the utility expense is not questionable. If a case also includes EBD MA and utilities have been verified for that program, leave the existing verification value. If verification is needed in circumstances when the household's claim is questionable and a WHEAP payment has not been received, workers should enter a 'Q?' for the expense and document in Case Comments why the self-declared information was determined questionable.

Because FS will not automatically pend for the utility expense until the update in June, the worker should take the following actions on cases that are not eligible for expedited issuance. Cases eligible for expedited issuance should be confirmed and the expedited benefit issued based on the applicant's claimed expenses.

If FS is pending for another reason: Add a worker note to the VCL to inform the customer of the need to verify proof of the applicable utility obligations in order to get a credit for this obligation. List examples of proof that can be used as: a utility bill, rental agreement or lease.

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If FS is not pending for any other reason, assess if the utility claim would make a difference in the food unit's benefit allotment:

- If no, confirm benefits and issue a manual Request for Verification form (DWSP-2303) to inform the customer of the need to verify proof of the applicable utility obligations in order to get a credit for this obligation. Let them know that it does not impact their benefit amount at the current time, but it may be beneficial for them to have it on file in case it may impact the benefit amount in the future. List examples of proof that can be used as a utility bill, rental agreement or lease.
- If yes, do not confirm FS benefits. Issue a manual VCL to inform the customer of the need to verify proof of the applicable utility obligations in order to get a credit for this obligation. List examples of proof that can be used as a utility bill, rental agreement or lease. Create an Expected Change in CWW for the date the verification is due so you can follow up on the alert generated and take the appropriate action (entry of a QV and confirming FS without the deduction for that utility) if verification is not received by the due date.

Verification functionality will be updated with the late June 2014 release to allow workers to pend for verification of the utility obligation with the 'Q?' with the system generated VCL and disallow the claimed expense with an entry of 'QV' as described in the following chart:

| Verification Code Functionality – Utility Costs – Effective 6/30/201 | 4 | |
|--|--------------------|-------------------------------|
| Verification Value | Deduction Allowed? | FS Pends for Verification? |
| Q? | Yes | Yes |
| ?, NQ, NV, SP, or valid verification code such as BI, LL, OW | Yes | No |
| QV | No | No |

Note: If a worker is running with dates to determine FS between the period of 4/2009 to 4/2014, s/he will need to ensure that the HSUA is granted in the FS budget for those months by updating the WHEAP question on the Expense Gatepost to 'Yes'. Once this is done and the backdated month(s) are confirmed, the question should be set back to the appropriate response for future determinations.

CORRESPONDENCE:

Changes will be made to several forms and notices to accommodate this policy. Changes will be made by April 28th unless otherwise noted.

The following manual forms will be updated to include utility related information:

- FoodShare Page 1 (F-16019A)
- FoodShare Page 1 with Application (F-16019B)
- FoodShare and/or CC SMRF (F-16076) Manual Form Available late June 2014.
- FoodShare and/or CC SMRF (F-16076A) Manual Form Instructions Available late June 2014.

A new fact sheet, <u>FoodShare Standard Utility Credits</u> (P-00654), is available on the DHS web to explain the policy change.

Utility related changes for system issued correspondence are planned for the late June release, including:

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- A PDF of the Application Summary
- Verification Checklist (Proof Needed and Information Needed Sections)
- Enrollment and Benefits (E&B)
- FoodShare 45 Day Renewal Reminder Letter

CONTACTS:

BEPS CARES Information & Problem Resolution Center

*Program Categories – FS – FoodShare, MA – Medicaid, BC+ – BadgerCare Plus, SC – Senior Care, CTS – Caretaker Supplement, CC – Child Care, W-2 – Wisconsin Works, FSET – FoodShare Employment and Training, BC+ Core – BadgerCare Plus Core, CF – Children First, EA – Emergency Assistance, JAL – Job Access Loan, JC - Job Center Programs, RAP – Refugee Assistance Program, WIA – Workforce Investment Act, Other EP – Other Employment Programs.

DHS/DHCAA/BEPS/JZ;ME